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Ms. Anna I. Filutowski
RCRA Compliance Unit, WCM-126
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Subject: Transformer PCB Investigation Plan, initial data report
Boeing Plant 2, WAD 00925 6819
RCRA Docket #1092-01-22-3008(h)

Dear Ms. Filutowski:

Please find enclosed analytical data results for the Phase 1 soil and groundwater samples collected in early June 2003 according to the subject plan. While Phase 1 sediment sampling in conjunction with this plan is not expected to occur until mid August 2003, it is appropriate for Boeing to provide EPA these initial results so that your evaluation can begin.

Although it is premature to provide definitive Phase 1 conclusions and recommendations for Phase 2 sampling until the sediment and bank samples are in hand, we believe results to date can be summarized in the following manner.

- The DQO of establishing extent of release at 1 ppm was generally achieved on Jorgensen property to the south and to the north on Boeing property.
- The extent was generally not achieved to the east along the fence line on Boeing property; this may warrant Phase 2 sampling.
- Extent was generally achieved to the west along the fence line on Boeing property, though this may be open to interpretation relative to the density of sampling necessary to establish extent.
- Concentrations were most elevated at the "area of discovery"; they generally decrease with depth and distance.
- Aroclors present include 1260 and 1254.
- Petroleum odor and sheen were observed in several locations at 10-12 feet below ground surface; preliminary review of HCID analysis indicates weathered diesel and gasoline; the pattern of odor vs. sheen may warrant closer scrutiny.
- Groundwater flows west to the waterway.
- Groundwater at the closest down gradient well (PL2-006A) to the Transformer Pad had PCB concentrations of 0.13 ug/L (1254) and 0.28 ug/L (1260). The other three down gradient wells sampled were ND.

Boeing believes it is premature to draw firm conclusions from these initial data, so such conclusions will be determined following availability of quality-assured data from Phase 1 bank and sediment samples.

Please call should you have any questions or comments regarding this report.

USEPA RCRA



3017099



Sincerely,

Will Ernst

Will Ernst
Project Coordinator
SSG Environmental Remediation
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Enclosure

cc: Howard Orlean – EPA (by email)
Hideo Fujita – Washington Department of Ecology (by email)

